

RESULTS

Q1. First off, how many phone lines do you currently have at your location, including phone, fax, and DSL lines?

When asked how many phone lines their business had at their location, respondents in Seattle provided the highest mean (9.3), followed by Minneapolis / St. Paul (8.0), Portland (7.4), Salt Lake City (5.9), and Tacoma (4.6).

If you examine the average (mean) number of lines per customer on a provider basis, you find that AT&T has the largest number of lines per customer (12.9), followed by Integra (6.4), Eschelon (6.2), Qwest (5.5), McLeod (4.2), and Verizon (3.9).

	<u>Portland</u>	<u>Seattle</u>	<u>Tacoma</u>	<u>Salt Lake</u>	<u>Minneapolis/ St. Paul</u>
Total Participants	389	390	387	389	389
1	18%	10%	18%	14%	16%
2	23	18	25	25	21
3	17	17	17	15	16
4	14	12	14	12	13
5	7	10	7	8	7
6	5	9	4	7	7
7-10	9	13	7	8	12
11-20	4	5	4	6	4
Over 20	3	5	2	4	3
Refused / No answer	-	1	1	0	-
Mean (lines)	7.4	9.3	4.6	5.9	8.0

Q2. Who is your current local telephone service provider? (Unaided)

In all five MSA's, Qwest was the dominant leader in terms of market share. Qwest's greatest dominance was in Tacoma, where 69% of respondents have Qwest's local service. On the low end, 40% of respondents in Portland said Qwest is their current local telephone service provider. Qwest's share in Salt Lake City, Seattle, and Minneapolis / St. Paul fell in-between these two MSA's (58%, 56% and 53%, respectively).

Integra came in second overall (tied with Verizon at 8%), with market share ranging from 2% in Tacoma to 14% in Portland. In Salt Lake, Integra's market share is 11%, followed by Minneapolis / St. Paul (7%) and Seattle (6%).

It is important to note that in each market there was at least one competitor (other than Qwest) that ranked higher than or equal to Integra in terms of market share (in some cases, within the margin-of-error of +/-5%). In Portland and Seattle, that competitor is Verizon, while in Salt Lake, it is AT&T, and in Minneapolis / St. Paul, it is McLeod. In Tacoma, there were four firms that were *at least* tied with Integra. In each case (other than Portland), there were a host of other firms, as well, that were within reach of Integra, based on the margin-of-error.

While Qwest was the dominant provider across all analyzed subsegments, it is interesting to note that larger companies, based on total number of phone lines, number of employees, and annual sales, tended for the most part, to be less likely than smaller companies to use Qwest. Integra, on the other hand, tended to be used more by larger companies (11+ phone lines, 10-49 employees, \$2.5 – 5 million / Over \$10 million in sales).

	<u>Portland</u>	<u>Seattle</u>	<u>Tacoma</u>	<u>Salt Lake</u>	<u>Minneapolis/ St. Paul</u>
Total Participants	389	390	387	389	389
Qwest	40%	56%	69%	58%	53%
Integra	14	6	2	11	7
Verizon	23	14	1	1	1
AT&T	5	5	10	11	4
Eschelon	5	4	6	2	6
McLeod	1	1	2	8	10
Allegiance	2	5	0	0	1
Pop	-	-	-	-	6
Advanced Telecom Group (ATG)	1	-	5	-	-
Comcast	1	1	1	1	2
Worldcom / MCI	2	0	1	1	1
XO Communications	0	2	-	1	0

(Continued)

Q2. Who is your current local telephone service provider? (Continued)

	<u>Portland</u>	<u>Seattle</u>	<u>Tacoma</u>	<u>Salt Lake</u>	<u>Minneapolis/ St. Paul</u>
Total Participants	389	390	387	389	389
Sprint	1	1	-	0	2
US Link	-	-	-	-	3
US West	1	0	1	1	-
CenturyTel	-	1	1	-	-
Electric Lightwave (ELI)	0	0	0	1	-
Tel West	-	1	0	-	-
Miscellaneous	4	2	2	3	4
Refused	1	1	-	1	1

Current Provider

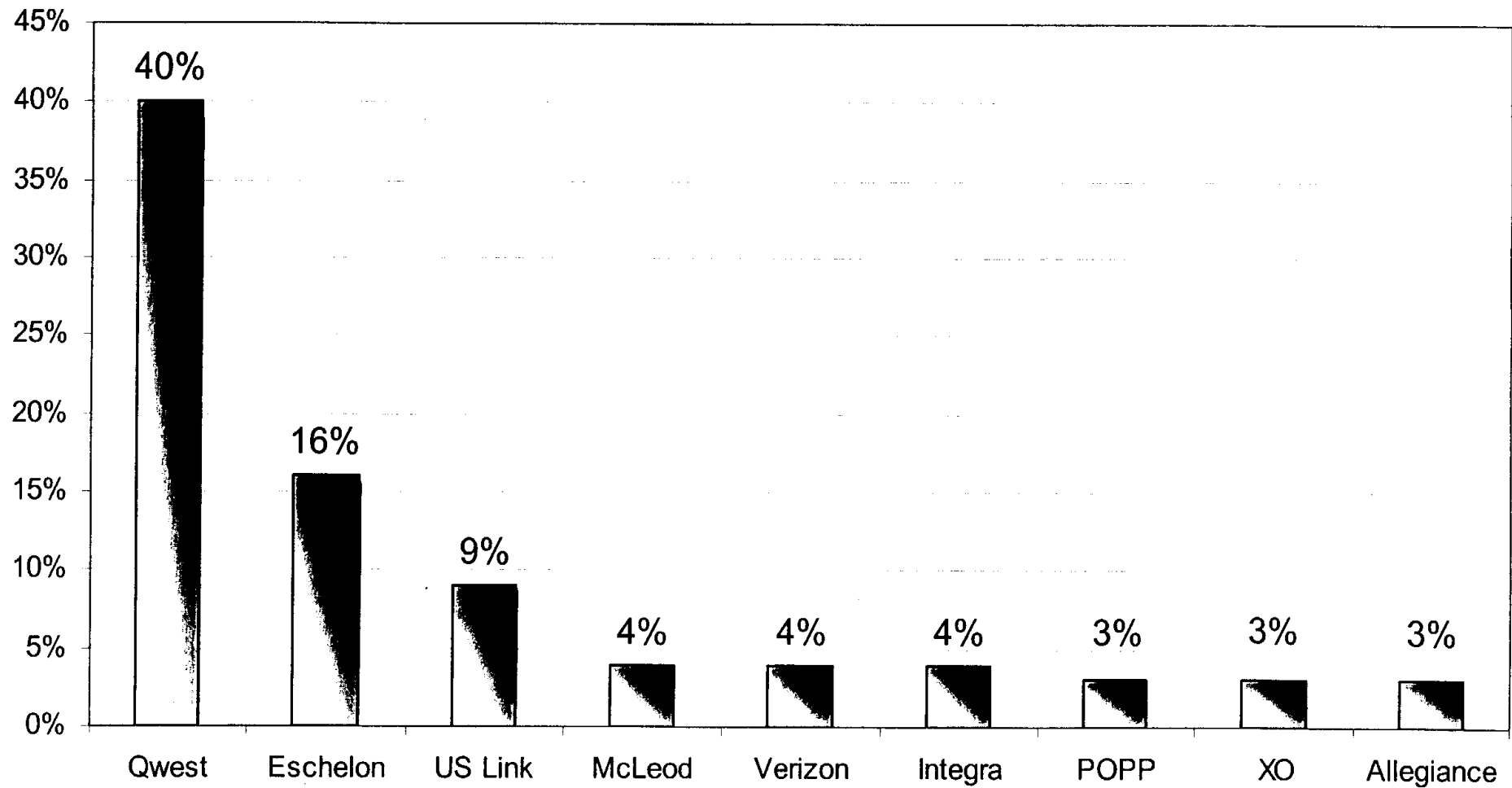
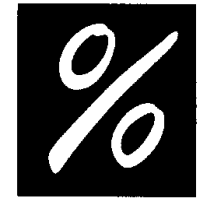


EXHIBIT C

	Total Business Locations	# that are under 24 ALEs	% that are under 24 ALEs	# that are 24 to 47 ALEs	% that are 24 to 47 ALEs	# that are 48 to 95 ALEs	% that are 48 to 95 ALEs	# that are 96 ALEs or greater	% that are 96 ALEs or greater
MN-N Market	2278	2175	95.4%	74	3.2%	67	2.9%	5	0.3%
MN-S Market	5870	5324	90.6%	453	7.7%	85	1.4%	8	0.1%
ND Market	1183	1162	98.2%	16	1.3%	4	0.3%	1	0.1%
OR OMA	9357	8716	93.1%	500	5.3%	122	1.3%	15	0.2%
WA OMA	3162	2777	87.8%	302	9.5%	76	2.4%	6	0.2%
UT OMA	3930	3750	95.4%	142	3.6%	34	0.8%	4	0.1%
TOTAL	25780	23904	92.7%	1487	5.8%	388	1.5%	39	0.2%

Exhibit D to the Affidavit of John Nee

Region/MSA	Total companies	Companies with fewer than 100 access lines	Percentage of businesses falling within Integra's target market
Portland-Vancouver, OR-WA	96,287	90,183	94
Seattle-Bellevue-Everett, WA	134,875	127,265	94
Tacoma, WA	29,609	27,848	94
Salt Lake City-Ogden, UT	58,655	54,138	92
Minneapolis-St. Paul, MN	133,612	125,474	94
Grand Forks, ND, MN	5,054	4,836	96
Fargo-Moorhead, ND, MN	9,325	8,796	94

Appendix D

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	WC Docket
Unbundled Access to)	No. 04-313
Network Elements)	
)	
Review of the)	
Section 251 Unbundling Obligations)	CC Docket
For Incumbent Local Exchange)	No. 01-338
Carriers)	

Affidavit of Bill Littler

1. My name is Bill Littler. I am the Director of Carrier Services for Integra Telecom. I report to and work under the supervision of Dave Bennett, Vice President of Network Planning.
2. I have been employed by Integra Telecom for four years, ten months. Prior to my employment with Integra, I was with ELI for three years. Prior to my employment with ELI, I was with MCI for five years. I have a total of thirteen years of experience in the Telecom industry.
3. I was responsible for collecting information about the availability of loops and transport from Integra's competitors and from CAP providers. Some of the information I obtained by contacting companies by telephone; some of the information I obtained pursuant to signed Non-Disclosure Agreements, meaning that I can only refer to it generally in this affidavit. I attempt to be as specific as possible while fully complying with the Non-Disclosure Agreements. Of the 23 carriers about whom I compiled information, Integra has signed Non-disclosure Agreements with at least 18. Therefore, I am severely limited in the level of detail I can disclose about other carrier's networks.
4. I prepared the chart attached as Exhibit A to my affidavit based on a combination of telephone contacts and general industry information. The chart addresses every company identified in either the independent or internal surveys, in the analysis of Integra's largest customers, or in the service technician surveys. XO includes Allegiance because XO bought Allegiance's assets out of bankruptcy.

5. No company other than Qwest and Verizon have loops available to the entire Integra customer base. The loops from companies claiming to have loops available for wholesale lease share two characteristics: first, the loops are all connected to specific large customers or large buildings, not to the general customer base that Integra serves. Second, none of the loops connect with the ILEC central offices where Integra needs collocation. All of the loops connect to the provider's network, which means the loops is very different from an ILEC loop and not a competitive product.
6. Clicks Network is owned by the City of Tacoma, Washington. The loops it has connect only a small fraction of the total buildings in Tacoma.
7. It is also important to understand the financial characteristics of some of these companies. Table 1 shows the companies that can claim to have provisioned loops or transport, but also ended up filing for bankruptcy or experiencing other types of financial difficulty. The companies that did not experience financial difficulty are owned by ILECs, municipalities, or electric power companies.

Table 1

Name of company with self-provisioned loops or transport.	File for bankruptcy, do financial re-organization, or propped up by a parent company?
SHAL	No, ILEC owned
XO	Yes
Onvoy	No, ILEC owned
Clicks Network	No, owned by municipality
GST/Time Warner	Yes, GST pre-TW
ELI	Yes, parent propped
MCI	Yes, bankruptcy
Onvoy	No, ILEC owned
Winstar	Yes
Eventis	No, owned by electric power company
McLeod	Yes, bankruptcy
Astound	No, owned by electric power company
Eschelon	Yes, financial reorganization

Dated:



Bill Littler
Director of Carrier Services

Exhibit A - Littler Affidavit

Survey			Provider	Type	Integra Operating Market Area	Loops		Transport		ILEC CO Presence	Remarks
Ind.	Top 25	Int.				Wholesale Offering	Self Provisioning	Wholesale Offering	Self Provisioning		
1	1	1	XO (inc. Allegiance)	CLEC/CAP	All	Yes	Yes	OCN only	OCN Only	Some	Loops available only to selected buildings connected to XO's network
1	1		MCI	CLEC/CAP	All	Yes	Yes	OCN only	OCN Only	Some	Loops available only to selected buildings connected to MCI's network
1	1	1	ELI	CLEC/CAP	Oregon, Washinton, Utah	Yes	Yes	Yes	Yes	Some	Loops available only to selected buildings connected to ELI's network
			ELI	CLEC/CAP	Oregon, Washington, Utah						Transport available, dark fiber available to limited CO's
1			McLeod	CLEC	All	Yes	Yes	Yes	Yes		Loops available only to selected buildings connected to McLeod's network. Dark fiber is available to some CO's.
			McLeod	CLEC	All						I have emailed Mary Tribby. She has not responded at this time.
1			AT&T	CLEC	All						
1			ATG	CLEC	Oregon, Washington	No	No	No	No	N/A	N/A
1			Comcast	Cable							Dan Williams contacted - He didn't know if they even have a wholesale division. He will check and call back...no response as of 09/21/04
			Comcast	Cable							OCN Transport only to limited number of CO's
1			Sprint	ILEC		No	No	OCN only	OCN Only	Some	N/A
1			Telwest	CLEC	Washington	No	No	No	No	N/A	N/A
1			POPP Telecom	CLEC	Minnesota	No	No	No	No	N/A	N/A
1			US Link	CLEC	Minnesota	No	No	No	No	N/A	N/A
1			Eschelon	CLEC	All	No	No	No	No	N/A	N/A
	1		Click	CLEC	Tacoma, Wa	Yes	Yes	No	No	No	Loops available only to selected buildings connected to Click's network
	1		Shal	CAP	Part of NW Minnesota	Yes	Yes	Long Haul	Long Haul	Some	Loops available only to selected buildings connected to Shal's network
			Shal	CAP	Part of NW Minnesota						Some Longhaul Transport, no dark fiber available
	1		Onvoy	CAP	Minnesota	No	No	Yes	Yes	Some	OCN Transport available, no dark fiber available product, connected to limited number of CO's
			Onvoy	CAP	Minnesota						Dan Close - Multiple calls, no response
	1		Eventis	CAP	Eastern Minnesota						
	1	1	Time Warner	CLEC/CAP	Oregon, SW Washington	Yes	Yes	Yes	Yes	Some	Loops available only to selected buildings connected to GST's network
			Time Warner	CLEC/CAP	Oregon, SW Washington						No dark fiber product, OCN connection to a limited number of CO's
	1		Winstar	CLEC	Minnesota	No	No	No	No	N/A	N/A
	1	1	LightPoint	Data Prov	Portland, Ore	No	No	No	No	N/A	N/A
		1	Astound	CLEC	Minnesota	No	No	No	No	N/A	Residential offerings only
		1	FiberNet	CAP	Minnesota						John Dowd - Multiple calls, No response
			Qwest	ILEC	All	Yes	Yes	Yes	Yes	All	Will not share info on Competitors as we have all signed NDA's
			Verizon	ILEC	Portions of Oregon, Washington	Yes	Yes	Yes	Yes	All	Will not share info on Competitors as we have all signed NDA's

Appendix E

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)	WC Docket
Unbundled Access to)	No. 04-313
Network Elements)	
)	
Review of the)	
Section 251 Unbundling Obligations)	CC Docket
For Incumbent Local Exchange)	No. 01-338
Carriers)	

Affidavit of Dave Bennett

Background

1. My name is Dave Bennett. I am employed by Integra Telecom as the Vice President of Network Planning.
2. I have worked in the telecommunications industry for over 34 years. I joined Integra as Vice President of Operations for the Oregon Market Area in December 1999. In November 2000, I transitioned into my current position. Prior to joining Integra, I was the Regional Manager, Operations with CenturyTel, responsible for overseeing 400,000 access lines in ten states. Prior to that, I was the Regional Manager of Engineering with CenturyTel. Before joining CenturyTel, I was the Corporate Manager of Engineering with Pacific Telecom, Inc.
3. As the Vice President of Network Planning, I am responsible for the design, construction, purchasing, and engineering of the network used by the company to provide voice, data, and all other services. I am also responsible for purchasing all loops and transport, whether unbundled network elements, special access, or from an alternate provider.
4. I must be careful when discussing the network designs of other carriers. When a carrier shares network design information, it requires me to sign a Non-disclosure Agreement. Those agreements preclude me from sharing any information with people outside of Integra. I cannot put information in an affidavit that is subject to a Non-disclosure Agreement. Therefore, I am limited in what I can say on certain subjects. Bill Littler, who works for me as the Director of Carrier Services, is likewise limited.

Customer base

5. Integra's target market is the small to medium sized business customer. The average Integra customer has eight access lines, generating less than \$400 per month in revenue. The customer typically has no in-house telecom expertise and is not considered a sophisticated purchaser of telecom services. Integra customers are served with an almost even mix of DS-0 and DS-1 lines: 44% DS-1, 56% DS-0.
6. Appendix B is a listing and ranking of MSAs depicting the service areas in which Integra currently does business. These areas generally include the following major cities and their surrounding areas: Portland, Eugene, McMinnville, and Salem in Oregon; Seattle, Tacoma, Everett and Vancouver in Washington; Salt Lake City, Ogden, Park City, and Provo in Utah; Minneapolis, St. Paul, Brainerd, Nisswa, Baxter, Little Falls, Moorhead, Duluth and St. Cloud in Minnesota; Fargo and Grand Forks in North Dakota.

Loop Impairment Analysis: Survey of Businesses

7. As part of identifying potential alternate providers of loops and transport, Integra retained the services of an independent vendor to conduct a survey of businesses in our target market. A copy of the survey protocol and questions asked is found in Appendix C, the Affidavit of John Nee. The target group was businesses with fewer than 96 access lines at one location, located in the geographic areas in which Integra does business, the areas generally described in Appendix B. Each business was asked to identify its current provider of local exchange services. The identity of each provider was recorded and tabulated. See Appendix C.
8. Bill Littler gathered information about each local exchange carrier identified in the surveys. See Appendix D, Affidavit of Bill Littler. None of the carriers identified as active in Integra's target market is a wireless or satellite provider. See Appendix C.

Loop Impairment: Analysis of the top 100: the 25 largest customers in each geographic area.

9. I was responsible for the survey that analyzed the demarcation points for the company's 25 largest customers in each of four geographic markets. The twenty-five largest customers in Minnesota/North Dakota, Oregon, Washington, and Utah were examined. The purpose was to determine how many of Integra's largest customers have more than one loop coming to their premises. 99.8% of Integra's customers have fewer than 96 access lines at any one location. See Exhibit C to Appendix C, Affidavit of John Nee. A direct observation of every customer demarcation point would be the ideal way to make this determination. Because that is virtually impossible, we focused on 100 large customers, the twenty-five largest in each market.
10. Integra's largest twenty-five retail customers in each market are less than four-tenths of 1% of Integra's total customer base--0.00389. The largest customer has 408 access lines at one location. The average number of access lines for this customer group is 95. The average number of access lines for all Integra business customers is 8. This means that the vast majority of Integra customers use dramatically fewer access lines than the 100

largest customers. If a majority of customers with 95 access lines do not have alternate provider loops, it follows that customers with only 8 access lines also do not have alternate loops.

11. In the state of Washington, only two of the 25 largest customers had a loop from a non-ILEC. The companies with demarks at these two customers are ELI and MCI at one and Click Networks at the other. The customer with the Click Networks loop has 408 access lines at one location.
12. The remaining 23 largest customers in the state of Washington, with an average of 97 access lines per location, have only the ILEC loop running to their premises.
13. In the state of Oregon, none of the 25 largest customers, with an average of 110 loops at one location, had loops provisioned by an alternate provider. Pre-Telecom Act of 1996, the Oregon Graduate Institute provisioned loops for connecting its buildings with its PBX. The founders of Integra acquired the Oregon Graduate Institute's telecom service so the loops installed by the Institute to serve its own needs pre-1996 show up today as Integra loops. These pre-Telecom Act loops provisioned by a customer to serve its own needs are not the type of loops under scrutiny in an impairment analysis. Integra only identifies this issue in the interest of full disclosure.
14. In the state of Utah, only 3 of the 25 largest customers had loops from an alternate provider. All three were ELI, a company that was propped up by a parent company. None of the other 22 customers, with an average of 67 access lines per location, had alternate provider loops.
15. In the state of Minnesota/North Dakota, only 6 of the 25 largest customers had loops from an alternate provider. The remaining 19 customers, with an average of 76 access lines per location, have only the ILEC loop running to their premises.
16. Only 11 customers had more than the ILEC loop to their premises. The providers of these loops were identified as ELI, Click Networks, MCI, Winstar, GST/Time-Warner, Eventis, SHAL, Fibernet, Integra and Onvoy. If 89% of Integra's 100 largest customers, averaging 95 access lines per location, do not have multiple loops, it is fair to conclude that the remaining customer base, averaging 8 access lines per location, also do not have multiple loops.

Survey of demarks by service technicians

17. I was also responsible for collecting and analyzing the data from the service technicians during their one week of observing demarks at customer installs and service work. A total of 188 demarks were visited, with only 6 non-ILEC loops observed. This means that 97% of our randomly chosen customers had only the ILEC loop to their premises. Three of those loops were provisioned by XO in the state of Utah; two by ELI, one each in Washington and Oregon; 1 by GST/Time Warner in Oregon.

Loop Impairment Analysis: There are no competitive loops because alternate provider loops are entirely different products than ILEC loops.

18. Integra is in existence to make money. The decisions I make about what I purchase or what I lease are made with a focus on profit. If I can buy loops or transport at better prices than ILEC loops and transport, I do so. However, the loops and transport available from alternative suppliers are not truly competitive with ILEC loops and transport. They are really different products, initially designed to accomplish different objectives, resulting in pricing schemes that make one far more expensive than the other and prevent them from being truly competitive.
19. Exhibit A to my affidavit is a diagram depicting the typical Qwest/Verizon loop and the typical alternate provider loop. I made this diagram based on my experience with the system designs of Qwest, Verizon, and alternate suppliers in general.
20. This diagram shows why alternate loops are not competitive with ILEC loops. ILEC loops were designed and installed over a period in history when the ILECs were monopoly providers, operating under rate of return regulation. Under rate of return regulation, ILECs recovered all dollars spent on capital improvements like the installation of loops, plus a percentage recovery above the capital dollars. This meant that ILECs had incentive to spend capital dollars, to make infrastructure improvements. These loops connect **ALL** customers within a geographic area to the ILEC switch.
21. When Integra made its sunk investment in hundreds of millions of capital equipment and infrastructure beginning eight years ago, it did so based on the law and interconnection agreements which established the points of entry or connection to the ILEC's network. Integra installed equipment to serve customers within specific geographic areas, based usually on a dark fiber ring configuration that uses ILEC transport to connect the ILEC central offices in which Integra has collocated equipment to serve customers with Integra's hub, and uses ILEC loops to connect with retail customers. Integra's equipment is located in leased collocation space within Qwest and Verizon wire centers. In other words, Integra's network was built to use the ILEC's feeder/distribution network to connect our switches to our hub and to retail customers.
22. A Verizon or Qwest loop connects the wire center directly to the customer premise. The price is "Flat Rated", depending upon the zone.
23. Alternative provider loops were designed and installed during a completely different period of time. These loops were all installed within the recent past. For the companies that installed these loops, there was no guaranteed recovery, no monopoly status. To the contrary, efficiency was a valued commodity. Unlike the ILEC network that was built to serve **ALL** customers in a large geographic area, the alternative provider loop was designed to serve select, targeted, large customers. The alternative provider loop connects that large customer to the alternative provider's hub, not to the ILEC's network.
24. Another issue is the quantity of loops that are available from alternate providers. Another anonymous ATP has 101 buildings connected to its network in the **entire** greater Seattle area (Seattle, Bellevue, Everett, and Tacoma). This is the largest foot-print of any ATP

Integra is aware of. According to information from Qwest's ICON Database, in the 13 collocations served by Integra in Qwest's operating area, there are 1,131,077 business loops available. John Nee's Exhibit D to Appendix C provides information from Dunn & Bradstreet that shows 94% of business loops are in Integra's segment of the market (small to medium sized businesses). This equates to 1,063,212 loops available to Integra as potential customers through Qwest. The 101 buildings with loops from the ATP with the largest footprint in the Seattle area represent .0095% (95/10,000's of 1%) of all potential Integra customers in the greater Seattle area, customers for which the ILEC has a loop running to each one. A company with only 95/10,000's of 1 % of the loops in a geographical area is not competitive with an ILEC that has 100%.

25. Integra's business plan and network configuration is based on interconnecting with the ILEC's network in order to serve as many customers as possible in a large geographic area. This is significantly different from an alternative provider network that is intended to only serve specific, large customers.
26. Because the alternative provider's network configuration is different, the cost is different as well. Alternative provider costs are distance sensitive, meaning they increase with distance. As Exhibit A shows, the alternative provider loop is necessarily significantly longer than the ILEC loop. With distance sensitive pricing, this means the alternative provider loop will always be significantly more expensive than the ILEC loop.
27. Integra has located its equipment within ILEC wire centers to serve a broad base of customers. If alternative provider loops do not terminate within those wire centers, they are not competitive with ILEC loops. Either duplicate equipment must be installed by Integra within the alternate provider's location or additional cross-connects or tie cable and transport are required to connect Integra's equipment located in the ILEC wire centers to the point in the alternate provider's network where access to the loop can be obtained. This translates into additional cost for equipment, space, and power, and additional facility length, which affects transmission characteristics and cost.
28. I cannot justify paying significantly more money for a loop from an alternative provider. There is no additional value or benefit to Integra from spending the additional money. Therefore, it makes no sense to say that loops from alternative providers are a competitive alternative to ILEC loops. They are not.

Loop Impairment Analysis: Self-provisioning loops

29. It is my responsibility to analyze the costs and benefits of provisioning infrastructure, comparing that analysis with the purchase of unbundled network elements. The average customer base served by Integra does not justify the investment necessary to provision loops.
30. Essentially, to self-provision loops, a CLEC would have to completely replicate the ILEC network. Building loops is about much more than just the loop: the loop is just one part of the design. The loop must then be connected to the network, to the nearest central office. The CLEC would literally have to build the same tree and branch design (feeder and distribution), following the same streets to the same premises as the ILEC.

Of course, the ILEC built its system with a 100% market share under a rate of return regulatory scheme where it was guaranteed recovery of every dollar spent plus a double-digit profit. CLECs have no such market share and no such guarantee of cost recovery. With an average market share of 10%, and an average customer generating a revenue stream of less than \$400 per month, Integra cannot possibly duplicate the ILEC network.

Loop Impairment Analysis: Special Access as an alternative to ILEC loops

31. Special Access is a pricing methodology, not a product. The actual facility used to provide the underlying service is the same for both ILEC special access and ILEC unbundled network elements. Special Access is not an economically viable alternative to unbundled loops at TELRIC.
32. If Integra were forced to move all EEL and loop costs to special access prices, the economic impact would destroy the company. Today, Integra pays ILECs approximately \$.5 million each month for DS-1 loops and DS-1 EELs. At special access prices, this amount jumps to \$1.1 million each month, a 220 % increase. This increase turns a profit making company into an insolvent company.
33. Special access pricing will never be an economically viable or adequate substitute for ILEC unbundled network elements because Integra's business plan is based on TELRIC pricing. The company relied on the FCC's determination that TELRIC pricing would be used for unbundled network elements. The design of our network and the specifics of our business plan rely on TELRIC and its continuation.
34. The only time I would purchase loops at special access rates is if EELs or other unbundled network elements are unavailable for some reason. Those reasons may include the crossing of a LATA boundary, the crossing of a state boundary, or the crossing of a rate center boundary. I only make these purchases because I have to in order to serve a specific customer. Special access is not an adequate substitute for unbundled network elements at TELRIC pricing.
35. During the period 1996, the beginning of competition, until January 2002, Verizon's computer systems were unable to bill for unbundled network elements. When Integra purchased unbundled network elements from Verizon, Verizon sent a bill for special access, then discounted the bill by 80% for all UNE products to approximate UNE rates. See bills marked as Exhibit C to this Affidavit. This means, for example, that a \$100 special access loop was actually billed at \$20 to approximate UNE rates. The percentage increase from \$20 to \$100 is 500. Verizon's own real-life bills demonstrate that special access rates are a 500% increase over UNE rates.
36. To say or imply that companies like Integra were purchasing from special access is misleading at best. Other companies undoubtedly have their own stories. Integra was purchasing unbundled network elements and it took Verizon six years to configure its billing systems so it could bill for UNEs. Integra did not purchase special access; it

purchased unbundled network elements from a company that took six years to fix its computer systems.

Transport Impairment Analysis: a three-step methodology

37. The Transport impairment analysis was conducted under my direction and control. We carried out our analysis as a three-step process. I will describe each of the steps.
38. The first step was to contact each of the Competitive Access Providers (CAPs) operating within the same market area as Integra. We identified the CAPs by using the independent and internal surveys and our own knowledge of the local markets.
39. We then surveyed each of the companies to determine if they own transport/dark fiber facilities; if so, which ILEC collocations their facilities connect; and if they are willing to lease those facilities to competitors. If they are willing to lease the facilities, we asked about the terms, conditions, and prices.
40. The carrier contact was made by Bill Littler, the Director of Carrier Services, who reports to me. The results of what Mr. Littler learned are found in his affidavit, Appendix D.
41. The most important thing we learned from the CAPs is that none of them has transport/dark fiber facilities that can be considered competitive products with the ILEC transport/dark fiber. None of them can be considered competitive because none of them was designed to connect all of the ILEC central offices that are important to Integra's business plan. The transport installed by these CAPs was installed to connect a large customer to the CAPs hub facilities, not to connect ALL of the ILEC central offices to Integra's hub location. Integra needs connections to ILEC central offices, not to CAP hubs. CAPs deliberately by-passed the majority of the very central offices to which we need to interconnect.
42. Integra's business plan is based on a network configuration that interconnects with the ILEC network at carefully chosen, negotiated points of access. Integra installs its own switch in a Market Area, uses ILEC dark fiber to create a ring that connects the ILEC central offices with Integra's hub, installs equipment in the ILEC central offices, and uses the ILEC loops to connect with retail customers. All of Integra's investments in infrastructure have been made with this design in mind. To compete with ILEC transport, CAP transport must mirror this design. It must connect ILEC central offices where Integra is collocated with Integra's hub in a ring configuration.
43. The ILEC network design and the CAP network design are two entirely different models, designed for entirely different purposes. The CAP network design was never intended to connect with ILEC central offices so ILEC loops could be used to connect with retail customers. CAPS took an entirely different approach to network design.
44. CAPS made a deliberate decision to by-pass most ILEC central offices and not use ILEC loops to connect with customers. Instead, CAPS built networks directly to very large selected customers or locations where it could reasonably be anticipated that large

numbers of customers might someday exist, like major office buildings and airports. Facilities were run from the CAPS hub directly to large customer premises. A few ILEC central offices are connected but these connections were all made very strategically, depending entirely upon connecting with a retail customer.

45. For example, Integra is collocated in 12 Qwest central offices in the Seattle, Redmond, Tacoma area. A CAP that has the largest foot-print that we could find, who must remain anonymous because of Non-disclosure Agreements, has some transport in this same area. However, the CAP only has transport connecting 5 of the 12 central offices in which Integra is collocated. This CAP does not have facilities that Integra can use to duplicate any of the 4 dark fiber rings Integra has in the greater Seattle area. This CAP has the broadest footprint of connections to ILEC central offices of all the CAP's surveyed.
46. This transport product is not competitive with ILEC transport because it does not connect ALL the central offices in which Integra is collocated. It cannot replicate the ring configuration that is essential to Integra's network design. Without these rings, Integra has no means to connect all 12 ILEC central offices where Integra serves customers today.
47. Exhibit B to this Affidavit illustrates the differences between Integra's ring configurations using ILEC dark fiber and the offering of an anonymous alternate transport provider. Exhibit B has two pages: the first page shows Integra's existing network design and depicts four different ring configurations connecting various Qwest central offices using Qwest dark fiber. This is the design of Integra's network as it exists today. This is the design and configuration that an alternate transport provider must replicate in order to have a competitive product.
48. The second page of Exhibit B shows the routes the anonymous alternate transport provider has available in the Seattle, Redmond, Tacoma area. As you can see, the alternate provider routes do not even come close to duplicating any of Integra's four ring configurations. The four ring configurations have a total of approximately 12 routes. Of those 12 routes, the alternate provider has transport on only 4 of them, connecting 5 ILEC central offices. Connecting with central offices was simply not an important feature of the CAP network design.
50. Close is not good enough when it comes to transport and dark fiber. Running somewhere in the vicinity of an ILEC collocation is not good enough; running through the manhole a block away is not good enough. Integra must have transport facilities that originate and terminate in all ILEC central offices in which Integra is collocated on a given ring configuration. Forcing Integra to use multiple transport providers on a single ring configuration causes all kinds of problems with who to call when problems arise, who is responsible for maintenance issues, multiple billing issues, and added transaction costs in dealing with multiple providers that significantly increase the cost of transport. This is the very issue that the FCC recognized when it discussed the inherent problems with different links from multiple carriers to complete a route.
51. Because CAP transport/dark fiber is a different product, it also has a significantly different price. The CAP transport/dark fiber is significantly more expensive than ILEC

transport or dark fiber because it is priced on a distance sensitive basis, and the design of the CAP network means that the transport/dark fiber is significantly longer than the ILEC transport.

For Integra to utilize the 5 routes indicated above, the cost for additional fiber would be \$53,000 more per month (over a 500% increase). Integra's Fiber Optic equipment would not work in this configuration due to the additional 115 miles in length of the fiber route without installation of repeaters. This scenario would still require Integra to utilize ILEC fiber to connect the remaining collocations. Integra has attempted to negotiate a commercial agreement with one of the two ILEC's in our service territory to determine what the cost for dark fiber would be if the un-bundling requirement were to be removed but the ILEC has refused to negotiate on any item other than UNE-P. In addition to the technical challenges and costs associated with significantly increasing the transport mileage, the additional mileage increases the potential for service interruptions.

52. I have purchased CAP transport when ILEC transport is not available, or when CAP transport is more economical than ILEC transport.
53. The second step of our transport/dark fiber impairment analysis was to contact each CLEC operating within the same market areas as Integra. Each CLEC was asked if it owned transport or dark fiber facilities. If the answer was in the affirmative, we asked which ILEC collocations their facilities connected. We also asked if the facilities were available for lease and, if so, under what terms, condition, and prices.
54. Mr. Littler conducted this questioning. The results are found in his affidavit, Appendix D. Some of the CLECs own transport or dark fiber for lease. This transport or dark fiber connects only a few ILEC central offices. This does not surprise me because Integra has found it necessary to take the same approach to transport as these CLECs: we installed transport necessary to connect our hub to the nearest ILEC central office. Beyond that connection, we could not make a business case for installing transport.
55. Our third step was to contact both Qwest and Verizon and ask for information on the availability of competitive access providers whose facilities terminate in their central offices. As you can see from Mr. Littler's affidavit, Appendix D, neither Qwest nor Verizon had any information to share with us any different from what we already knew from steps one and two.
56. We have leased many miles of dark fiber from Qwest. When we lease dark fiber from an ILEC, we must invest millions of dollars in optronic equipment that lights the fiber. This is not an investment made by the ILEC, this investment is made by Integra. So, for each pair of dark fiber leased, Integra has invested in the equipment to light it up. If this dark fiber is taken away from Integra, and replaced with supposedly competitive lit fiber, we will have a stranded investment of all of the optic equipment we purchased to light the dark fiber. If this dark fiber is replaced with competitive dark fiber, Integra will also have some stranded optronics as the existing equipment is serving customers today. It cannot be simply turned down and re-deployed on new fiber. That would put our customer base out of service. The cutover process to migrate to another company's dark fiber is a dangerous undertaking. That cutover would have the potential to adversely

affect every customer Integra serves. As of today, that investment totals approximately \$5 million.

Integra cannot make a business case for self-provisioning transport

57. The TRO has an extensive record on the impossibility of CLECs duplicating the ILEC transport and dark fiber network. At this point in the development of the marketplace, the cost of installing transport cannot be justified by the existing or short-term potential revenue streams. Over time, Integra will hopefully build a customer mass that overcomes these economic and operational barriers and justifies an investment in transport. Today, we are simply not even close.
58. The average Integra customer generates less than \$400 per month in revenue. Dark fiber transport construction costs an average of \$60,000 per mile in rural areas, and \$350,000 per mile in urban areas. Suppose Integra were to self-provision all of the transport it uses in the Seattle area. The Seattle area is a mix of very urban and suburban areas. As a result, consider that the average construction cost per mile of fiber based on the ILEC central offices Integra would need to connect is approximately \$271,000. Integra uses approximately 192 miles of transport in Seattle. Total cost to build transport: approximately \$52 million.
59. To justify an expenditure of \$52 million to duplicate ILEC transport in Seattle, Integra would have to have the same market conditions that the ILEC had when it built the transport: a 100 percent market share and guaranteed cost recovery plus a profit. A 10% market share based on customers generating an average monthly revenue stream of less than \$400 does not make self-provisioning transport an economically viable alternative. Appendix E, Affidavit of Dave Bennett.

Application of the TRO standards to Transport

60. Based on Integra's survey information, there are no routes used by Integra where three or more carriers have self-provisioned transport. Integra also does not have any routes with two or more wholesale transport providers, immediately capable and willing to provide transport at a specific capacity along a give route between ILEC switches or wire centers. Therefore, Integra continues to be impaired under the transport standards established in the TRO.

Special access transport is not a substitute for ILEC transport

61. If Integra were forced to move all transport costs from TELRIC pricing to special access pricing, the economic impact would destroy the company. Today, Integra pays ILECs approximately \$140,000 per month for UNE transport. At special access prices, transport costs jump to \$880,000 per month, over a 600% increase. Given that Integra's entire business plan and pricing is based on TELRIC pricing, special access is not even close to an adequate substitute.

DS-1, DS-3, and Dark Fiber Transport are all critical to Integra's success.

62. Integra is impaired without access to DS-1, DS-3 and dark fiber transport.
63. Integra's business plan and product pricing was built around access to DS-1, DS-3 and dark fiber transport. Today, dark fiber is the primary method of connecting central offices in which Integra is collocated with Qwest and Verizon. Some DS-1s and DS-3s are used when dark fiber is not available, and Integra has made extensive use of DS-3s. DS-1s are used extensively as trunking to connect tandems and end offices or to extend facilities to serve customers in an ILEC central office where Integra is not physically collocated. See affidavit of Dave Bennett, Appendix E.
64. The differences in pricing between DS-1s, DS-3s, and dark fiber are what have the potential to devastate Integra. Here is an example that illustrates the pricing impacts:
65. First, it is important to understand how the different products relate to each other. A DS-0 is the smallest capacity product. This is a single copper pair, or equivalent, the type typically used to serve a residential customer. A DS-1 is next on the hierarchy, consisting of 24 DS-0s. DS-3 is next, consisting of 28 DS-1s, or 672 DS-0s (24x28). Dark fiber is unlit fiber. When it is lit, it is referenced with the letters "OC". Depending upon the type of optronic equipment used to lit it, dark fiber can be lit at a capacity along a spectrum from OC-3 to OC-12 to OC-48, or even OC-192. The alphabetical reference of OC indicates optical; the numeric reference of 3 or 12 or 48 or 192 indicates the number of DS-3s. So, for example, OC-48 has the same capacity as 48 DS-3s, or 1,344 DS-1s (48x28).
66. Why does Integra use one product rather than another? This is where capacity and pricing come together. A certain amount of capacity is needed on a given route. The average DS-1 in Oregon from Qwest costs about \$42. The average DS-3 costs about \$333 (assumes \$253 plus a mileage charge for an 8 mile route, which adds about \$80). This means that it is the most cost effective for Integra to use up to 7 DS-1s on a route, rather than purchase a DS-3 (7 DS-1s times \$42 equals \$294). Once the capacity need increases to where 8 DS-1s are needed, it makes economic sense for Integra to purchase a DS-3 (8 DS-1s times \$42 equals \$336 vs. \$333 for a DS-3).
67. Now, a DS-3 is equal to 28 DS-1s. So, once it makes economic sense for Integra to go to a DS-3, it now has the capacity of 28 DS-1s.
68. If the FCC were to take DS-3s away from Integra, leaving it only with DS-1s, the economic impact is devastating.
69. Continuing with the example: for \$333, Integra gets a DS-3, with the capacity of 28 DS-1s. The cost of 28 DS-1s, if purchased as DS-1s rather than as DS-3s, is approximately 28x\$42 or \$1,176. This number is almost 400% higher than purchasing a DS-3. This impact would be economically devastating to Integra.

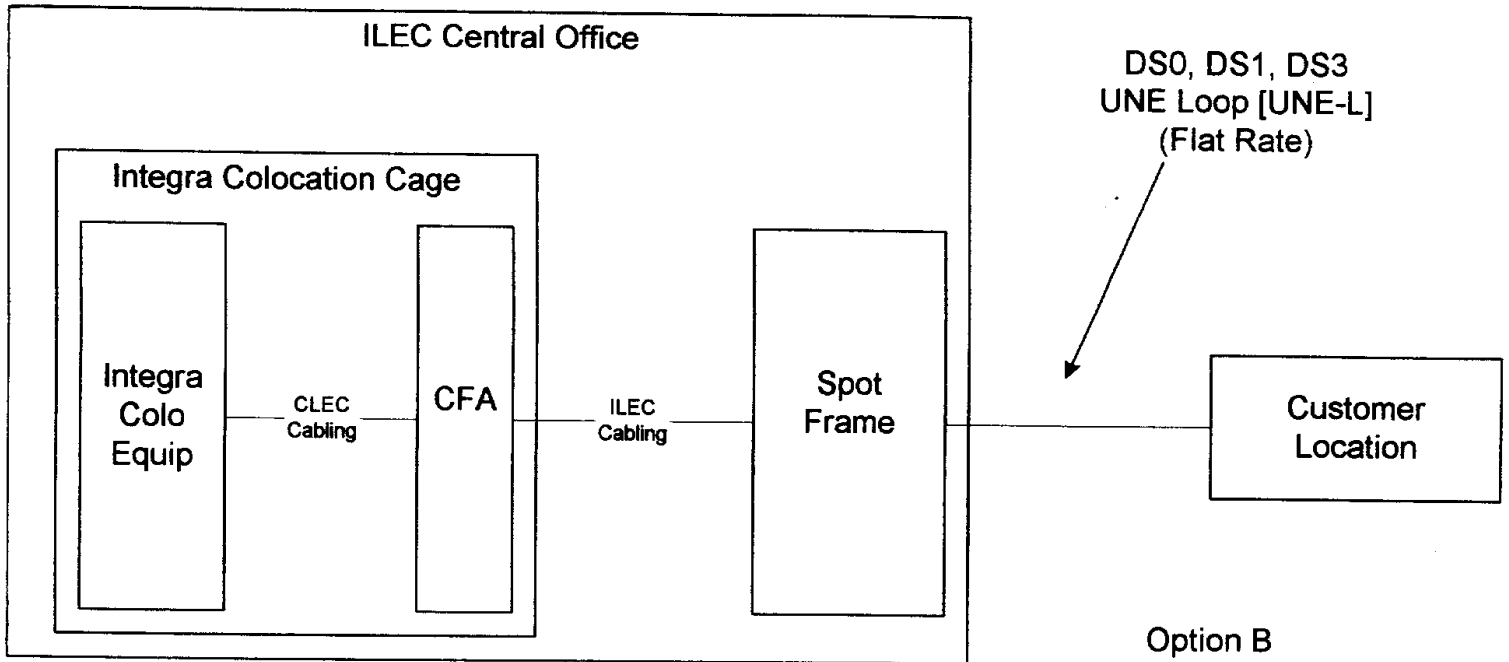
70. This same type of example plays out with higher capacity products. Take a fiber product for example. Let's use a dark fiber product that Integra has lit with its own optronic equipment at an OC-48 capacity. The cost of an 8 mile piece of Qwest dark fiber in Oregon is approximately \$544 per month. (\$68 per mile x 8 miles) (None of the numbers in the examples include non-recurring charges; actual costs are therefore higher than those depicted). Remember that an OC-48 is 48 DS-3s, or 1,344 DS-1s (48 x 28).
71. If the FCC were to take away dark fiber and leave only DS-1 transport, instead of paying \$544 for an OC-48, Integra would pay \$42 x 1,344 DS-1s for a total of \$56,448. To be clear: without dark fiber, what costs Integra \$544 per month today would cost \$56,448. No business plan can absorb this impact and CLEC wire-line competition will end.

Dated: 9/30/04

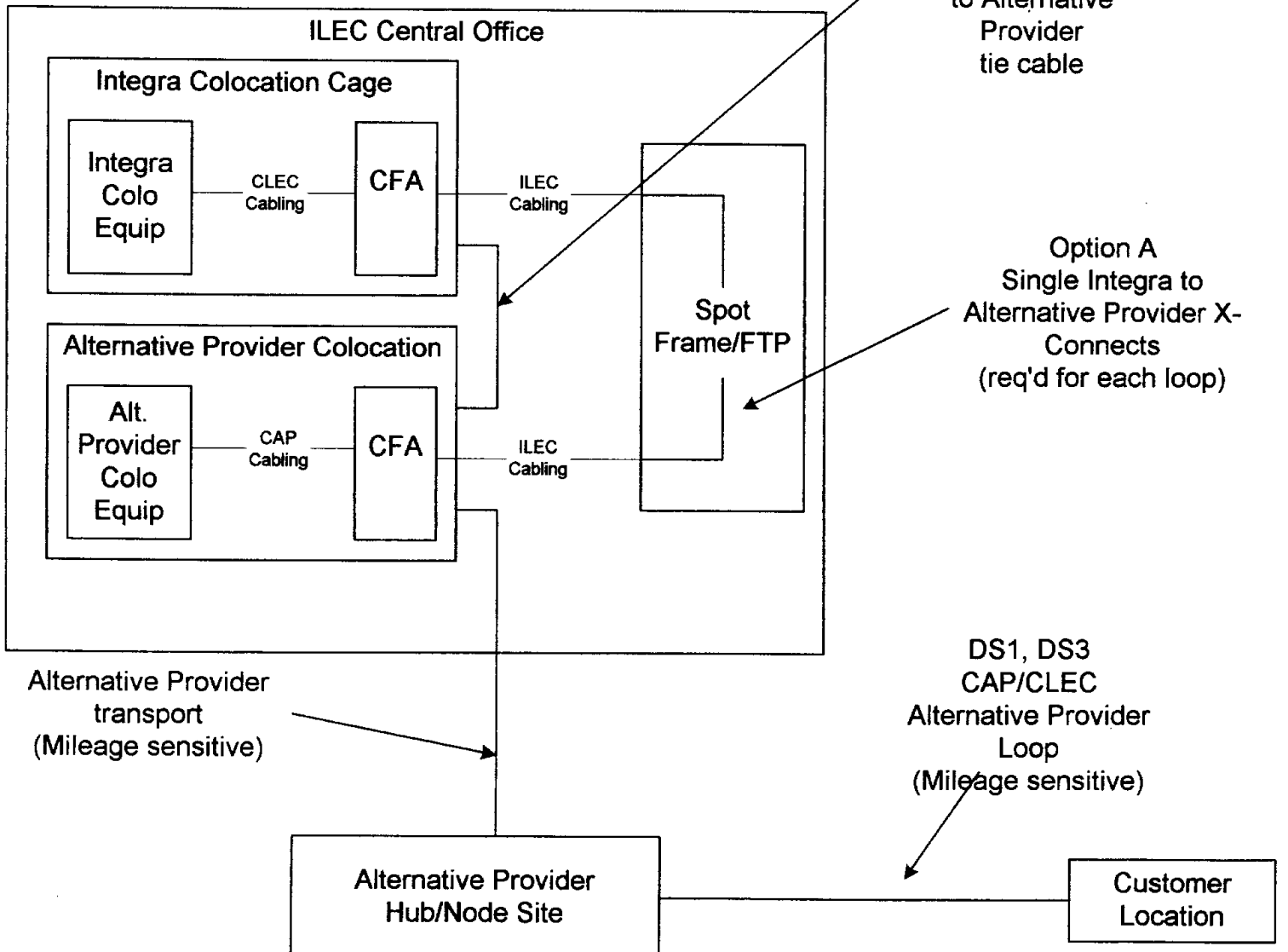


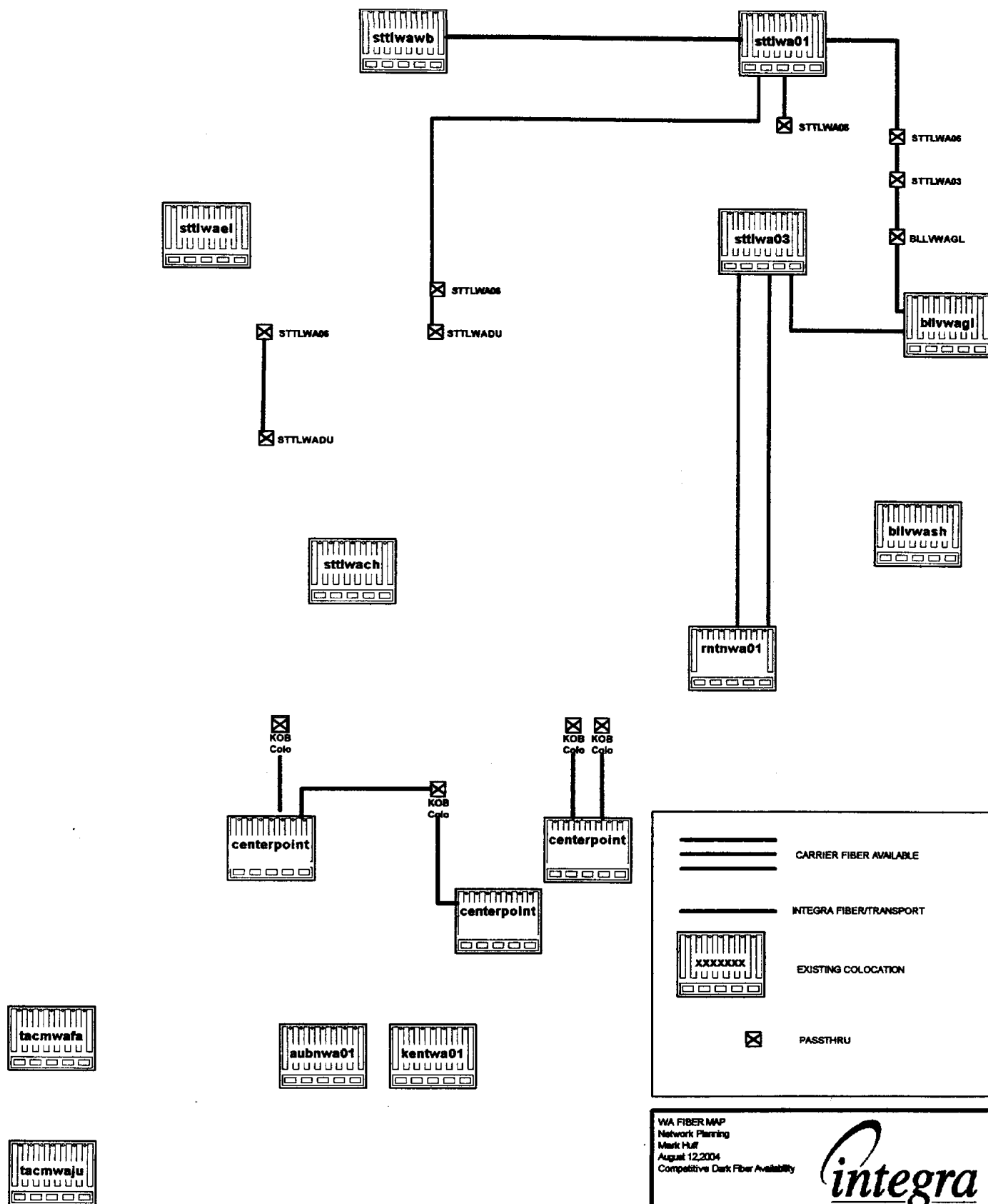
Dave Bennett
Vice President, Network Planning

Qwest/Verizon UNE Loop



Alternative Provider Loop







BILL NO
INVOICE NO
BILL DATE

N14 SQA-2736 105
SQA2736105-02087
MAR 28, 2002
PAGE 1
ACNA OGT

FACILITY ACCESS SERVICE

*** BALANCE DUE INFORMATION ***

TOTAL AMOUNT OF LAST BILL	673,348.87
PAYMENTS APPLIED - SEE DETAIL	54,979.89CR
<hr/>	
TOTAL BALANCE DUE - SEE DETAIL	618,368.98

*** DETAIL OF CURRENT CHARGES ***

TOTAL-OREGON		
LATE PAYMENT CHARGES - SEE DETAIL		4,355.85
INTERSTATE	1,118.41	
INTRASTATE	3,237.44	
MONTHLY ACCESS CHARGES		
FROM MAR 28 THRU APR 27		20,724.48
INTERSTATE/INTERLATA	1,997.40	
INTRASTATE/INTERLATA	18,727.08	
OTHER CHARGES AND CREDITS - SEE DETAIL		
INTERSTATE/INTERLATA	750.58	44,583.34CR
INTRASTATE/INTERLATA	45,333.92CR	
<hr/>		
TOTAL CURRENT CHARGES		19,503.01CR

TOTAL AMOUNT DUE	598,865.97
------------------	------------

LATE PAYMENT CHARGES WILL APPLY ON
BALANCES NOT PAID BY THE DUE DATE

4610-01 2974.21
4611-01 7211.54
4612-01 1057.15
7777-01 <36872.04>
9999-01 6126.13
4210 <1770.28>
5924 <4355.85>

RECEIVED
APR 04 2002
DTEG RA #



CUSTOMER SERVICE RECORD
(CSR) N14 SQA-2736 105
3-29-02 PAGE 1
OGT

BILLING INQUIRIES CALL (800) 483-6222
BILL DAY 28TH ACCT DATE 03-29-02 FOR TELCO USE ICSC OFC GE01

---ACCOUNT IDENTIFICATION---

FOR TELCO USE ACNA OGT LAT 672 TYP SVC N TAX A
TAR OR00
CCNA OGT

BILLED TO: OGT TELECOMM
ATTN: NETWORK COST
19545 NW VON NEUMANN DR
ST 200
BEAVERTON OR 97006

CUSTOMER SERVICE ADDRESS: 1-19545 NW VONNEUMAN, BEA
VERTON, OR
1-SMRWORVNW1
2-14335 NW SCIENCE PARK D
R, PORTLAND, OR
2-CUSTOREU672
3-19545 NW VON NEUMANN DR
, BEAVERTON, OR
3-BVTNORCIW01
4-150 NW 20TH ST, GRESHAM
, OR
4-GRHMORXBW07
5-10860 SW BARNES RD, BEA
VERTON, OR
5-BVTNOR18W01
6-4155 SW CEDAR HILLS BLV
D, BEAVERTON, OR
6-BVTNORXBW09
7-276 S 9TH ST, HILLSBORO
, OR
7-HLBOORXBW04
8-150 NW 20TH ST, GRESHAM
, OR
8-GRHMORXBW12

CUSTOMER SERVICE RECORD

(CSR)

N14 SQA-2736 105

3-29-02

PAGE

3

OGT

---SERVICE AND FEATURES---

CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
022300			CKL	1-19545 NW VON NEUMANN DR, BEAVERTON, OR/ACTL 3/LSO 503 439/NC HCEM/NCI 04DS9.1S			051800	
022300			CKLT	2-BVTNORXBK01/TAR ORXX/DES CFA MUX LOCATION/LSO 503 350			051800	
022300			CKLT	3-BVTNORXBDS1/TAR OR00/LSO 503 350			051800	
120501		1	MQ1	TRA/TER 100.000% X 1 X 199.7700 X 0.2000 (G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)		39.95	030502*	
INTRASTATE SUBTOTAL						39.95		
FACILITY SUBTOTAL						39.95		
062899			CLS	85.HCFS.402076..GTEW/PIU 0			120101	
062899		1	XDHLX	/NOCH 24			120101	
062899			CKL	1-19545 NW VON NEUMANN DR, BEAVERTON, OR/TAR OR00/ACTL 2 /JLP JS =/LSO 503 439/NC HCZ- /NCI 04DU9.DN/SN OGI TELECOMM			070299	
062899		1	TRG	TRA/TER 100.000% X 1 X 19.3100 X 0.2000 (G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)		3.86	120101	
062899		6	1LFSX	TRA/TER 100.000% X 6 X 15.0000 X 0.2000 (G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)		18.00	120101	
062899			CKL	2-7451 NE EVERGREEN PKWY, HILLBORO, OR/TAR OR00/JLP JS = /LSO 503 640/NCI 04DU9.DN/SN F.E.I.			070299	
062899		1	TRG	TRA/TER 100.000% X 1 X 19.3100 X 0.2000 (G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)		3.86	120101	

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 5

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
				19.3100 X 0.2000		3.86	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899		5	1LFSX	TRA/TER 100.000% X 5 X			120101
				15.0000 X 0.2000		15.00	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899			CKL	2-7405 SW TECH CENTER DRIVE, PORTLAND, OR/TAR OR00/LOC RM MA TEL RM/LSO 503 684/NCI 04DS9.1S/SN FAXBACK INSTANT INFORMA			071799
062899		1	TRG	TRA/TER 100.000% X 1 X			120101
				19.3100 X 0.2000		3.86	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
				INTRASTATE SUBTOTAL		22.72	
				CIRCUIT SUBTOTAL		22.72	
062899			CLS	85.HCFS.403420..GTEW/PIU 0 /CKR DS1FAXBACK2.3/DES UT138. UT139			120101
062899		1	XDH1X	/NOCH 24			120101
062899			CKL	1-19545 NW VONNEUMAN, BEAVERTON, OR/ACTL 3/DES FIRST SYSTEM IS 85.HCFS. 403419..GTEW/LSO 503 520/NC HCE-/NCI 04DS9.1S			071799
062899		1	TRG	TRA/TER 100.000% X 1 X			120101
				19.3100 X 0.2000		3.86	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899		5	1LFSX	TRA/TER 100.000% X 5 X			120101
				15.0000 X 0.2000		15.00	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899			CKL	2-7405 SW TECH CENTER DRIVE, PORTLAND, OR/TAR OR00/LOC RM MA TEL RM/LSO 503 684/NCI			071799

CUSTOMER SERVICE RECORD

(CSR)

N14 SQA-2736 105

3-29-02

PAGE

7

OGT

---SERVICE AND FEATURES---

CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
				TRA/TER 100.000% X 1 X			
				201.2100 X 0.2000		40.24	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899		CKL		2-14270 NW SCIENCE PARK DR,			071799
				PORTLAND, OR/TAR OR00/LOC DES			
				INSTALL AT EXISTING DEMARC			
				/LSO 503 641/NCI 04DU9.1SN/SN			
				PACIFIC OFC AUTOMATION			
062899		24	S25EX				120101
				INTRASTATE SUBTOTAL		45.09	
				CIRCUIT SUBTOTAL		45.09	
062899		CLS		85.HCFS.403952..GTEW/PIU 0			120101
				/CKR DSL.PACOFC.TIE1/DES			
				UT138.UT139			
062899		1	XDH1X	/NOCH 24			120101
062899		CKL		1-14335 NW SCIENCE PARK DR,			071799
				PORTLAND, OR/TAR OR00/ACTL 2			
				/LOC DES INSTALL AT EXISTING			
				DMARC/LSO 503 350/NC HCE-/NCI			
				04DS9.1S/SN PACIFIC OFFICE			
				AUTOMATN			
062899		1	CCO				120101
				TRA/TER 100.000% X 1 X			
				24.2600 X 0.2000		4.85	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899		1	EUW				120101
				TRA/TER 100.000% X 1 X			
				201.2100 X 0.2000		40.24	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
062899		CKL		2-14215 NW SCIENCE PARK DR,			071799
				PORTLAND, OR/TAR OR00/LOC DES			
				INSTALL AT EXISTING DEMARC			
				/LSO 503 641/NCI 04DU9.1SN/SN			
				PACIFIC OFC AUTOMATION			
062899		24	S25EX				120101

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 9

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
041799		1	EUW	TRA/TER 100.000% X 1 X				120101
				201.2100 X 0.2000		40.24		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
041799			CKL	2-15400 NW GREENBRIER PKWY, BEAVERTON, OR/TAR OR00/JLP RJ48S JS = N/LOC RM A200; DES COMPUTER ROOM/LSO 503 641/NCI 04DU9.1SN/SN PACIFIC OFFICE AUTOMATIO				051999
041799		24	S25EX					120101
				INTRASTATE SUBTOTAL		45.09		
				CIRCUIT SUBTOTAL		45.09		
012100			CLS	85.HCFS.406479..GTEW/PIU 0 /CFA 9 T3 08 BVTNORCIW01 BVTNORXBK01/CKR DS1.VERNIER.1 /DES UT138.UT139				120101
012100		1	XDH1X	/NOCH 24				120101
012100			CKL	1-19545 NW VON NEUMANN DR, BEAVERTON, OR/ACTL 3/LSO 503 690/NC HCE-/NCI 04DS9.1S				080700
012100			CKLT	2-BVTNORXBK01/TAR ORXX/DES CFA MUX LOCATION/LSO 503 526				080700
012100			CKL	3-13979 MILIKAN WAY, BEAVERTON, OR/TAR OR00/JLP RJ48C JS = N/LOC FLR 1; RM DEMARC; DES SPOT IS BVTNORCIW01. TERMINATE IN MAIN DEMARC/LSO 503 350/NCI 04DU9.1SN/SN VERNIER SOFTWARE				080700
012100		1	CCO					120101
				TRA/TER 100.000% X 1 X				
				24.2600 X 0.2000		4.85		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
012100		1	EUW	TRA/TER 100.000% X 1 X				120101

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 11

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
022100		1	TRG	TRA/TER 100.000% X 1 X				120101
				19.3100 X 0.2000		3.86		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
022100		24	S25EX					120101
				INTRASTATE SUBTOTAL		67.81		
				CIRCUIT SUBTOTAL		67.81		
031500			CLS	85.HCFS.406828..GTEW/PIU 0				120101
				/CFA 10 T3 16 BVTNORCIW01				
				BVTNORXBK01/CKR DSI.BESTBUY.1				
				/DES UT138.UT139				
031500		1	XDHI1X	/NOCH 24				120101
031500			CKL	1-19545 NW VON NEUMANN DR,				081000
				BEAVERTON, OR/ACTL 1/LSO 503				
				439/NC HCE-/NCI 04DS9.1S				
031500		5	1LFSX					120101
				TRA/TER 100.000% X 5 X				
				15.0000 X 0.2000		15.00		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
031500			CKLT	2-BVTNORXBK01/TAR ORXX/DES				081000
				CFA MUX LOCATION/LSO 503 350				
031500		1	TRG					120101
				TRA/TER 100.000% X 1 X				
				19.3100 X 0.2000		3.86		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				
031500			CKL	3-21600 NW AMBERWOOD DR,				081000
				HILLSBORO, OR/TAR OR00/JLP				
				RJ48C JS = N/LOC FLR 1; RM				
				DEMARC; DES SPOT IS				
				BVTNORCIW01. TERMINATE IN				
				MAIN DEMARC/LSO 503 439/NCI				
				04DU9.1SN/SN BEST BUY				
				LANDSCAPE SUPPL				
031500		1	CCO					120101
				TRA/TER 100.000% X 1 X				
				24.2600 X 0.2000		4.85		

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 13

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
				HARD LOOP FOR TESTING./LSO				
				503 612/NCI 04DU9.1SN/SN				
				ADVANCED OFFICE SYSTEMS				
031700		1	CCO					120101
				TRA/TER 100.000% X 1 X				
				24.2600 X 0.2000		4.85		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				120101
031700		1	EUV					
				TRA/TER 100.000% X 1 X				
				201.2100 X 0.2000		40.24		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				120101
031700		1	TRG					
				TRA/TER 100.000% X 1 X				
				19.3100 X 0.2000		3.86		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				120101
031700		24	S25EX					
				INTRASTATE SUBTOTAL		79.81		
				CIRCUIT SUBTOTAL		79.81		
032000			CLS	85.HCFS.406844..GTEW/PIU 0				120101
				/CFA 10 T3 17 BVTNORCIW01				
				BVTNORXBK01/CKR DSI.SELCTR.N.1				
				/DES UT138.UT139				
032000		1	XDH1X	/NOCH 24				120101
032000			CKL	1-19545 NW VON NEUMANN DR,				062800
				BEAVERTON, OR/ACTL 3/LSO 503				
				439/NC HCE-/NCI 04DS9.1S				
032000		5	1LFSX					120101
				TRA/TER 100.000% X 5 X				
				15.0000 X 0.2000		15.00		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				062800
032000			CKLT	2-BVTNORXBK01/TAR ORXX/DES				
				CFA MUX LOCATION/LSO 503 350				120101
032000		1	TRG					
				TRA/TER 100.000% X 1 X				
				19.3100 X 0.2000		3.86		
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)				062800
032000			CKL	3-7225 SW BONITA RD, TIGARD,				

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 15

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
040500		1	TRG	TRA/TER 100.000% X 1 X 19.3100 X 0.2000		3.86	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
040500		CKL		3-14945 SW SEQUOIA PARKWAY, PORTLAND, OR/TAR OR00/JLP RJ48C JS = N/LOC FLR 1; RM DEMARC; DES SPOT IS BVTNORCIW01. TERMINATE IN MAIN DEMARC/LSO 503 968/NCI 04DU9.1SN/SN GEODESIGN			052400
040500		1	CCO	TRA/TER 100.000% X 1 X 24.2600 X 0.2000		4.85	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
040500		1	EUV	TRA/TER 100.000% X 1 X 201.2100 X 0.2000		40.24	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
040500		1	TRG	TRA/TER 100.000% X 1 X 19.3100 X 0.2000		3.86	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
040500		24	S25EX				120101
				INTRASTATE SUBTOTAL		67.81	
				CIRCUIT SUBTOTAL		67.81	
051200		CLS		85.HCFS.407031..GTEW/PIU 0 /CFA 11 T3 07 BVTNORCIW01 BVTNORXBK01/CKR DS1.THERMO.1 /DES UT138.UT139			120101
051200		1	XDH1X	/NOCH 24			120101
051200		CKL		1-19545 NW VON NEUMANN DR, BEAVERTON, OR/ACTL 3/LSO 503 439/NC HCE-/NCI 04DS9.1S			071700
051200		5	1LFSX	TRA/TER 100.000% X 5 X 15.0000 X 0.2000		15.00	120101

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 17

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
060700	5	1LFSX		TRA/TER 100.000% X 5 X 15.0000 X 0.2000		15.00	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
060700	CKLT	2-BVTNORXBK01/TAR ORXX/DES		CFA MUX LOCATION/LSO 503 350			091300
060700	1	TRG		TRA/TER 100.000% X 1 X 19.3100 X 0.2000		3.86	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
060700	CKL	3-16186 SW 72ND, TIGARD, OR		/TAR OR00/DES BLDG B; FLR 1; RM DEMARC; DES SPOT IS BVTNORCIW01. TERMINATE IN MAIN DEMARC/JLP RJ48C JS = N /LSO 503 431/NCI 04DU9.1SN/SN TANOUS JOE			091300
060700	1	CCO		TRA/TER 100.000% X 1 X 24.2600 X 0.2000		4.85	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
060700	1	EUW		TRA/TER 100.000% X 1 X 201.2100 X 0.2000		40.24	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
060700	1	TRG		TRA/TER 100.000% X 1 X 19.3100 X 0.2000		3.86	120101
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
060700	24	S25EX					120101
				INTRASTATE SUBTOTAL		67.81	
				CIRCUIT SUBTOTAL		67.81	
061700	CLS	85.HCFS.407283..GTEW/PIU 0		/CFA 13 T3 09 BVTNORCIW01 BVTNORXBK01/CKR DSI.SLATER1.1 /DES UT138.UT139			120101
061700	1	XDH1X		/NOCH 24			120101

CUSTOMER SERVICE RECORD

(CSR) N14 SQA-2736 105

3-29-02

PAGE 19

OGT

---SERVICE AND FEATURES--- CONT'D

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
				BVTNORXBK01/CKR DS1.INTEG1.1			
				/DES UT138.UT139			
061700		1	XDH1X	/NOCH 24			120101
061700			CKL	1-19545 NW VON NEUMANN DR,			070500
				BEAVERTON, OR/ACTL 3/LSO 503			
				439/NC HCE-/NCI 04DS9.1S			
061700		9	1LFSX				120101
				TRA/TER 100.000% X 9 X			
				15.0000 X 0.2000		27.00	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
061700			CKLT	2-BVTNORXBK01/TAR ORXX/DES			070500
				CFA MUX LOCATION/LSO 503 350			
061700		1	TRG				120101
				TRA/TER 100.000% X 1 X			
				19.3100 X 0.2000		3.86	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
061700			CKL	3-8050 WARM SPRINGS RM 150,			070500
				TULATIN, OR/TAR OR00/JLP			
				RJ48C JS = N/LOC FLR 1; RM			
				DEMARC; DES SPOT IS			
				BVTNORCIW01. TERMINATE IN			
				MAIN DEMARC/LSO 503 885/NCI			
				04DU9.1SN/SN INTEGRATE, INC.			
061700		1	CCO				120101
				TRA/TER 100.000% X 1 X			
				24.2600 X 0.2000		4.85	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
061700		1	EUW				120101
				TRA/TER 100.000% X 1 X			
				201.2100 X 0.2000		40.24	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
061700		1	TRG				120101
				TRA/TER 100.000% X 1 X			
				19.3100 X 0.2000		3.86	
				(G OGT98ALT01-OR5B-A 36 060199 053102 000070 000070)			
061700		24	S25EX				120101

INTRASTATE SUBTOTAL 79.81

CIRCUIT SUBTOTAL 79.81